REMARKS

The Office Action dated October 9, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-19, 25, 29, 52, and 54 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 47-49 and 51 have previously been cancelled. No new matter has been added. Therefore, claims 1-46, 50, and 52-55 are currently pending in the application and are respectfully submitted for consideration.

The Office Action acknowledged the previous amendments of claims 1, 14, 20, 41, 45-46, 50, and 52-55. The Office Action also acknowledged the cancellation of claims 47-49 and 51.

The Office Action rejected claims 1-3, 50, and 52 under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. 2003/0114145 ("Boda"). The rejection is respectfully traversed for at least the following reasons.

While the Office Action rejected claim 50, the Office Action merely alleged that Boda discloses limitations which are recited in claim 1, and did not address the limitations recited in claim 50. (see Office Action at pages 2 and 3). For example, the Office Action alleged that Boda disclosed a cellular receiver device, comprising, inter alia, a cellular receiver configured to enable receipt of data from a cellular network domain. This limitation is a limitation recited in claim 1, not recited in claim 50, which is

directed to a method. Thus, Applicants respectfully submits that the rejection of claim 50 is improper, and that claim 50 recites allowable material. Applicants respectfully request that either the rejection of claim 50 be withdrawn, or that the examiner issue a new Non-Final Office Action stating separately the reasons for claim 50 being rejected.

Claim 1, upon which claims 2-19 are dependent, recites an apparatus, which includes a cellular receiver configured to enable receipt of data from a data source of a cellular network domain. The apparatus further includes a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way.

Claim 50 recites a computer program embodied on a computer readable medium, said computer program configured to perform encrypting data to be forwarded, and forwarding said data to a digital radio broadcast domain based upon a conditional access scheme to control one of a server device and a gateway device. The computer program is further configured to perform defining by said conditional access scheme a predetermined offline time during which said mobile device has not been in the coverage area of a cellular network, and starting said data forwarding after expiry of said offline time.

Claim 52 recites an apparatus, which includes cellular receiving means for enabling receipt of data from a data source via a cellular network domain. The apparatus

further includes radio broadcast access means for providing conditional access to said data source via a digital radio broadcast data channel to enable receipt of said data via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way.

Thus, according to embodiments of the invention, data messages or services can be received by a mobile device even outside the coverage of a mobile network, while still being protected by ciphering and conditional access methods.

As will be discussed below, Boda fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the advantages and features discussed above.

Boda generally describes a method and system for users to select and participate in call-in broadcast programs are disclosed. A user speaks a station name into a mobile device, providing an indication that the request is for a broadcast channel, to tune the mobile device to that channel. The user initiates a request to contact a show by inputting an indication that the user would like to contact the show. The mobile device sends the request to a call server, which looks up the show's contact information based on the current channel being received by the mobile device, and forwards the request to a show representative. The show representative screens calls and provide automated responses. When the show's representative accepts a request to contact the show, the call server initiates a connection between the mobile device and a telephone or other device associated with the show. Once the connection has been established, the call server

withdraws from the connection, allowing the user to communicate with the show representative.

Applicants respectfully submit that Boda fails to disclose, teach, or suggest, all of the elements of the present claims. For example, Boda fails to disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1; and "radio broadcast access means for providing conditional access to said data source via a digital radio broadcast data channel to enable receipt of said data via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 52.

Boda discloses that a cellular network is used to initiate a call into a call-in show without being required to receive and/or remember a telephone number. (see Boda at paragraph 0006). More specifically, Boda discloses that when a mobile terminal user listens to a broadcast program which incites listeners to call into the program, the user can initiate a communication between the mobile terminal and a call server so as to establish a connection to the program. (see Boda at paragraph 0014). Thus, the broadcast channel and the cellular channel are necessarily used in combination, or in parallel, wherein the cellular channel is used as a bidirectional channel for

communication with the call server, while the broadcast channel is used in a unidirectional fashion in order to listen to the broadcast program.

Although the cellular receiver device of Boda comprises a cellular receiver and a radio broadcast access unit, the radio broadcast access unit is not configured to provide conditional access to a digital radio broadcast data channel to enable receipt of the data of the same data source from which data is received by the cellular receiver. In contrast, as claimed in claims 1, 50, and 52, the cellular receiver and the radio broadcast access unit embodiments of the present invention are configured to be used as alternative receivers so that data can be received outside the coverage of the cellular network domain by using the broadcast channel. In contrast, the invention described in Boda would not work outside the coverage of the cellular network domain, as the connection to the radio show is not capable of being established outside the coverage of the cellular network domain.

Therefore, for at least the reasons discussed above, Boda fails to disclose, teach, or suggest, all of the elements of claims 1, 50, and 52. For the reasons stated above, Applicants respectfully request that this rejection be withdrawn.

Claims 2-3 depend upon claim 1. Thus, Applicants respectfully submit that claims 2-3 should be allowed for at least their dependence upon claim 1, and for the specific limitations recited therein.

The Office Action rejected claims 4-6, 10, 15-16, 19-20, 22, 24-26, 28-29, 31, 35-36, 38, 41, 44-45, and 53-55 under 35 U.S.C. § 103(a) as being unpatentable over Boda in view of U.S. Publication No. 2002/0103935 ("Fishman"). Although the Office Action

initially stated that claims 4-55 were rejected, it is obvious from the subsequent remarks in the Office Action that only claims 4-6, 10, 15-16, 19-20, 22, 24-26, 28-29, 31, 35-36, 38, 41, 44-45, and 53-55 were rejected. The Office Action took the position that Boda discloses certain elements of the claims, and then cited Fishman as allegedly curing the deficiencies of Boda. The rejection is respectfully traversed for at least the following reasons.

Claim 20, upon which claims 21-40 are dependent, recites a server device, which includes a gateway configured to receive data from an external data source and to map a destination address of received data to a mobile subscriber identity. The server device further includes an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way.

Claim 41, upon which claims 42-44 are dependent, recites a gateway device configured to provide a connection between a cellular network and a digital radio broadcast domain. The gateway device is further configured to encrypt data received from said cellular network to be forwarded to a mobile device. The gateway device is further configured to forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage

of said cellular network domain using a broadcast channel and a cellular channel in an alternative way.

Claim 45 recites a system, which includes a cellular receiver device configured to receive data from a data source. The cellular receiving device includes a cellular receiver configured to enable receipt of said data from said data source via a cellular network domain, and a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel. The system further includes a server device configured to provide a data service to a mobile device. The server device includes a gateway configured to receive data from said data source and for mapping a destination address of received data to a mobile subscriber identity, and an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via said digital radio broadcast channel. The system further includes a gateway device configured to provide a connection between a cellular network and a digital radio broadcast domain. The gateway device is further configured to encrypt data received from said cellular network to be forwarded to said mobile device, and to forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way.

Claim 53 recites a server device, which includes gateway means for receiving data from an external data source and for mapping a destination address of received data to a mobile subscriber identity. The server device further includes adding means for adding said mobile subscriber identity to said received data, and for putting said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel to provide data service to a mobile device, so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way.

Claim 54 recites a gateway device, which includes providing means for providing a connection between a cellular network and a digital radio broadcast domain, and encrypting means for encrypting data received from said cellular network to be forwarded to a mobile device. The device further includes forwarding means for forwarding said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way.

Claim 55 recites a system, which includes cellular receiver means for receiving data from a data source. The cellular receiving means includes cellular receiving means for enabling receipt of said data from said data source via a cellular network domain, and radio broadcast access means for providing conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel. The system further includes server means for providing a data

service to a mobile device. The server means includes gateway means for receiving data from said data source and for mapping a destination address of received data to a mobile subscriber identity, and adding means for adding said mobile subscriber identity to said received data, and for putting said received data with said mobile subscriber identity to a data stream to be broadcast via said digital radio broadcast channel. The system further includes gateway means for providing a connection between a cellular network and a digital radio broadcast domain. The gateway means is configured to encrypt data received from said cellular network to be forwarded to said mobile device, and to forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way.

As will be discussed below, the combination of Boda and Fishman fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the advantages and features discussed above.

The description of Boda, discussed above, is incorporated herein. Fishman generally discloses methods, systems, and computer program products for customizing content based on at least one operating characteristic of a mobile client. A mobile gateway receives content from a content source, such as an email server, a Web server, or some other content server. The mobile gateway customizes the content based on transforms assigned to each mobile client. Fishman further discloses that transforms account for differences in the software, display, processor, memory, communication

channel, and the like, of each mobile client, without imposing additional processing burdens on the content server. Processing that is common among several transforms may be shared. Fishman further discloses that mobile clients may be any type of computer, including telephones, pagers, PDAs, laptops, and other mobile gateways.

Applicants respectfully submit that Boda and Fishman, whether considered individually, or in combination, fail to disclose, teach, or suggest, all of the elements of the present claims. For example, the combination of Boda and Fishman fails to disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1; or "an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 20, and similarly recited in claim 53; "forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way," as recited in claim 41, and similarly recited in claims 45, 54, and 55.

Claims 4-6, 10, 15-16, and 19 depend upon claim 1. For the reasons described above, Boda fails to disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1. With respect to claims 20, 41, 45, and 53-55, the Office Action correctly acknowledges that Boda fails to disclose or suggest, "an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 20, and similarly recited in claim 53; "forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way," as recited in claim 41, and similarly recited in claims 45, 54, and 55.

Fishman does not cure the deficiencies of Boda, as Fishman also fails to disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be

received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1; "an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 20, and similarly recited in claim 53; "forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way," as recited in claim 41, and similarly recited in claims 45, 54, and 55.

The Office Action combines the call server of Boda with the gateway and adder of Fishman and argues that Fishman teaches customization tables for clients and their corresponding information requests to be transmitted (see Office Action at page 6, last paragraph).

Fishman only discloses enabling receipt of data via a broadcast channel. However, Fishman does not suggest any alternative use of a cellular channel and a broadcast channel to enable receipt of data via an alternative channel in areas without cellular coverage. Upon receiving a content for a mobile client, the mobile gateway identifies an appropriate transform, and transforms the content and sends the transformed content to the mobile client. (see Fishman at paragraphs 0011-0015).

Even combining the references of Boda and Fishman, there is no disclosure or suggestion of receiving data with the mobile subscriber identity to a data stream to be broadcast via a digital broadcast channel so that data can be received outside the coverage of the cellular network domain by using the broadcast channel. The same applies to the gateway device of the present invention, which, in embodiments of the present invention, is configured to forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way. Neither Fishman, nor Boda, address the specific problem of making available messaging services or other data services outside the mobile coverage. Additionally, neither Fishman, nor Boda disclose or suggest using a broadcast domain as a backup when the mobile device is outside the mobile coverage.

Thus, Applicants respectfully submit that Fishman, whether considered individually or combined with Boda, fails to disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1; "an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be

received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 20, and similarly recited in claim 53; "forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way," as recited in claim 41, and similarly recited in claims 45, 54, and 55.

Furthermore, Applicants respectfully submit that the Office Action fails to establish a prima facie of obviousness, because it fails to establish a rationale as to why one of ordinary skill in the art would combine the cited references of Boda and Fishman.

As reiterated by the Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, 82 USPQ2d 1385 (2007), the framework for the objective analysis for determining obviousness under 35 U.S.C. § 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). Obviousness is a question of law based on underlying factual inquiries. The factual inquiries are: (a) determining the scope and content of the prior art; (b) ascertaining the differences between the claimed invention and the prior art; and (c) resolving the level of ordinary skill in the pertinent art. (see *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, 82 USPQ2d 1385 (2007); *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966); see also MPEP 2141).

The Supreme Court in *KSR* noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit. The court stated that "rejections on obviousness cannot be sustained by mere conclusory statements; instead there must be some

articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." (see *KSR*, 550 U.S. at ___, 82 UPSQ2d at 1396; see also MPEP 2141).

The Office Action gives absolutely no rationale as to why one of ordinary skill in the art would combine the cited references of Boda and Fishman. (see Office Action pages 4-11). As described above, Boda discloses that when a mobile terminal user listens to a broadcast program which incites listeners to call into the program, the user can initiate a communication between the mobile terminal and a call server so as to establish a connection to the program. (see Boda at paragraph 0014). Also, as described above, Fishman discloses a gateway and an adder and discloses enabling receipt of data via a broadcast channel. Fishman further discloses that, upon receiving a content for a mobile client, the mobile gateway identifies an appropriate transform, and transforms the content and sends the transformed content to the mobile client. (see Fishman at paragraphs 0011-0015). Applicants respectfully submit that it is not clear as to why one of ordinary skill in the art would combine the cited references of Boda and Fishman, and that the Office Action has failed to provide an explicit rationale for combing said references, as required by *KSR*. Thus, the Office Action fails to establish a prima facie case of obviousness.

Therefore, for at least the reasons discussed above, the combination of Boda and Fishman fails to disclose, teach, or suggest, all of the elements of claims 4-6, 10, 15-16, 19-20, 41, 45, and 53-55. For the reasons stated above, Applicants respectfully request that this rejection be withdrawn.

Claims 22, 24-26, 28-29, 31, 35-36, and 38 depend upon claim 20. Claim 44 depends upon claim 41. Thus, Applicants respectfully submit that claims 22, 24-26, 28-29, 31, 35-36, 38, and 44 should be allowed for at least their dependence upon claims 20 and 41, respectively, and for the specific limitations recited therein.

The Office Action rejected claims 7-9, 11-14, 17-18, 21, 23, 27, 30, 32-34, 37, and 39-40 under 35 U.S.C. § 103(a) as being unpatentable over Boda, Fishman, and further in view of EP 1067741 ("Mulham"). The Office Action took the position that the combination of Boda and Fishman discloses certain elements of the claims, and then cited Mulham as allegedly curing the deficiencies of Boda and Fishman. The rejection is respectfully traversed for at least the following reasons.

The descriptions of Boda and Fishman, discussed above, are incorporated herein. Mullham generally discloses a method of notifying a user of the receipt of an e-mail by a mail centre is described. The method includes transmitting a notification message in a broadcast signal. Mullham further discloses a method of notifying a user of the receipt of e-mail by a mail center, which e-mail is to be transmitted to the user via a first medium. The method includes transmitting a notification message, indicating the receipt of e-mail by the mail centre, to the user via a second medium, different from the first medium. Mullham further discloses a corresponding apparatus, receiver/decoder and system.

Claims 7-9, 11-14, 17-18, 21, 23, 27, 30, 32-34, 37, and 39-40 depend upon claims 1 and 20, respectively. As discussed above, Boda and Fishman, whether considered individually or in combination, do not disclose, teach, or suggest all of the elements of

claims 1 and 20. Furthermore, Mullham does not cure the deficiencies in Boda and Fishman, as Mullham also does not disclose, teach, or suggest, at least, "a radio broadcast access unit configured to provide conditional access to a digital radio broadcast data channel to enable receipt of said data from said data source via said digital radio broadcast data channel, so that data can be received outside the coverage of said cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 1; "an adder configured to add said mobile subscriber identity to said received data, and to put said received data with said mobile subscriber identity to a data stream to be broadcast via a digital radio broadcast channel so that data can be received outside the coverage of a cellular network domain using said broadcast channel and a cellular channel in an alternative way," as recited in claim 20. Thus, the combination of Boda, Fishman, and Mullham does not disclose, teach, or suggest all of the elements of claims 7-9, 11-14, 17-18, 21, 23, 27, 30, 32-34, 37, and 39-40. Additionally, claims 7-9, 11-14, 17-18, 21, 23, 27, 30, 32-34, 37, and 39-40 should be allowed for at their dependence upon claims 1 and 20, and for the specific limitations recited therein.

The Office Action rejected claims 42-43 and 46 under 35 U.S.C. § 103(a) as being unpatentable over Boda, Fishman, and further in view of EP 0804012 ("Risto"). The Office Action took the position that the combination of Boda and Fishman discloses certain elements of the claims, and then cited Risto as allegedly curing the deficiencies of

Boda and Fishman. The rejection is respectfully traversed for at least the following reasons.

Risto generally discloses equipment which is used for the reception of multimedia presentations and for their playback to the user. The equipment includes a storage and presentation apparatus such as a computer or television, and a terminal of a bidirectional communications system such as a mobile phone or cordless phone. The multimedia information is loaded dynamically, and keys needed to descramble scrambled transmissions are delivered to the user via a bidirectional communications system. In the terminal equipment a local agent which uses only a little of system capacity takes care of information loading and checks the available resources. Risto further discloses that bidirectional communications can also be used for making payments to the producer and/or distributor of the multimedia service in the form of operations similar to telebank services.

Claims 42-43 depend upon claim 41, respectively. As discussed above, Boda and Fishman do not disclose, teach, or suggest all of the elements of claim 41. Furthermore, Risto does not cure the deficiencies in Boda and Fishman, as Risto also does not disclose, teach, or suggest, at least, "forward said encrypted data to said digital radio broadcast domain based on a conditional access scheme, so that data can be received outside the coverage of said cellular network domain using a broadcast channel and a cellular channel in an alternative way," as recited in claim 41. Thus, the combination of Boda, Fishman, and Risto does not disclose, teach, or suggest all of the elements of claims 42-

43. Additionally, claims 42-43 should be allowed for at their dependence upon claim 41, and for the specific limitations recited therein.

Claim 46 recites a method, which includes encrypting data to be forwarded, and forwarding said data to a digital radio broadcast domain based on a conditional access scheme to transmit said data to a mobile device so that data can be received outside the coverage of a cellular network domain using a broadcast channel. The method further includes defining by said conditional access scheme a predetermined offline time during which said mobile device has not been in the coverage area of a cellular network; and starting said data forwarding after expiry of said offline time.

The Office Action treated claim 46 as if it was a dependent claim which depended upon claim 41, and thus, did not provide an independent rationale as to why said claim was rendered obvious in light of the cited references of Boda, Fishman, and Risto. (see Office Action at page 13). For example, with respect to claim 47, the Office Action stated that "[while Fishman did not disclose the following limitations], Risto discloses wherein said conditional access scheme defines a predetermined offline time during which said mobile device has not been in a coverage area of said cellular network, and wherein data forwarding is started after expiry of said offline time." (see Office Action at page 13).However, claim 46 is an independent claim, which does not depend upon claim 41, and is a claim with its own scope and limitations. While claim 46 recites limitations with similar language to claims 42 and 43, claim 46 also recites limitations not found in any of claims 41-43, such as "encrypting data to be forwarded," and "forwarding said

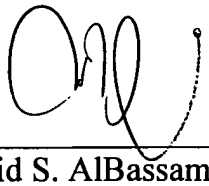
data to a digital radio broadcast domain based on a conditional access scheme to transmit said data to a mobile device," Thus, since the Office Action did not provide an explanation or rationale for the rejection of claim 46, Applicants assume that claim 46 recites allowable subject matter. Therefore, Applicants respectfully request that either the rejection to claim 46 be withdrawn, or that the examiner issue a new Non-Final Office Action stating separately the reasons for the rejection of claim 46.

For at least the reasons discussed above, Applicants respectfully submit that the cited prior art references fails to disclose or suggest all of the elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 1-46, 50, and 52-55 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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